

December 1, 2021

Mr. David Albright  
Manager, Groundwater Protection Section  
USEPA Region 9 (WTR-4-2)  
75 Hawthorne St  
San Francisco, CA 94105

Subject: Underground Injection Control (UIC) Permit Number R9UIC-AZ3FY11-1  
Monthly Update for AL Exceedance at Supplemental Monitoring Well M60-O

Dear Mr. Albright:

Florence Copper is providing this monthly update of supplemental monitoring well M60-O alert level (AL) exceedance under Underground Injection Control (UIC) Permit Number R9UIC-AZ3FY11-1 (Permit).

Florence Copper has been voluntarily monitoring M60-O monthly for radon, and last submitted a monthly update report on November 1, 2021. Table 1 (attached) has been updated to include the most recent laboratory results from the monthly sample collected on October 19, 2021 and received on November 11, 2021. Results from the monthly sample collected on November 9, 2021 are pending. Level I Indicator parameters remained well under their respective Alert Levels (Figure 1).

To aid rinsing efforts on the east side of the wellfield, injection into well I-02 was suspended in August and September, and I-02 was temporarily operated as a recovery well from September 28 to October 10, 2021. Injection into well I-01 was also suspended beginning October 14, 2021. Redevelopment of injection and recovery wells in the wellfield continued during the month as part of the ongoing rinsing activities.

In October and November recovery rates in the wellfield averaged greater than three times the injection rates. Hydraulic gradients were maintained throughout the month.

Florence Copper will continue monthly sampling of M60-O for radon and will report these results monthly to EPA until the concentration of radon is below the AL.

Please feel free to contact me should you have any questions or comments.

Sincerely,  
**Florence Copper, Inc.**

A handwritten signature in dark ink, appearing to read 'Brent Berg', with a long, sweeping horizontal line extending to the right.

Brent Berg  
General Manager

Cc: Nancy Rumrill, EPA Region 9  
Maribeth Greenslade, ADEQ

Table 1. M60-O Monthly Sampling Results

Parameter	UIC AL	UIC AQL	1/7/21	2/22/21	3/23/21	4/14/21	5/18/21	6/15/21	7/19/21	8/24/21	9/15/21	10/19/21
Radon (pCi/L)	2480	--	NA	NA	NA	<b>3073.6</b> <b>±308.1</b>	<b>9129</b> <b>±915.6</b>	<b>2985.3</b> <b>±299.4</b>	<b>3465.5</b> <b>±347.5</b>	<b>3066.1</b> <b>±307.7</b>	<b>2991.0</b> <b>±299.9</b>	<b>3579.0</b> <b>±359.0</b>

**BOLD** values are exceedance of AL and/or AQL

NA: not analyzed

## M60-O QUARTERLY CONCENTRATION GRAPHS

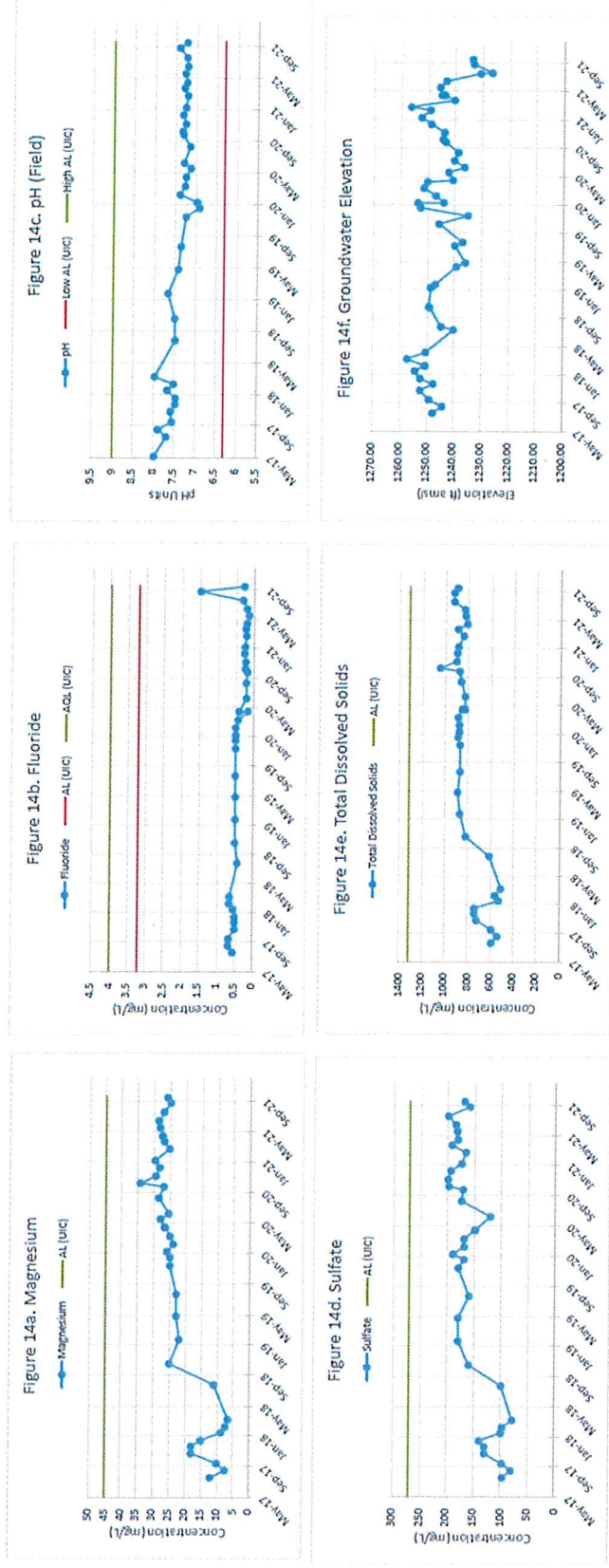


Figure 1. M60-O Indicator Parameter Quarterly Concentration Graphs (from 3Q21 Quarterly Report)